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13
14 UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON

15 In re
16 EASTERDAY RANCHES, INC., *et al.*
17 Debtors.¹
18 EASTERDAY RANCHES, INC. and
19 EASTERDAY FARMS,
20 Plaintiffs,
v.
21 ESTATE OF GALE A. EASTERDAY
(DECEASED), KAREN L. EASTERDAY,
22 CODY A. EASTERDAY, AND DEBBY
EASTERDAY
23 Defendants.
24

25 Chapter 11
26 Lead Case No. 21-00141-WLH11
27 Jointly Administered

28 Adv. Pro. No. 21-80050 (WLH)

**NOTICE OF PLAINTIFFS'
PROPOSED SCHEDULING
ORDER**

27
28 ¹ The Debtors along with their case numbers are as follows: Easterday Ranches, Inc. (21-00141) and Easterday Farms, a Washington general partnership (21-00176).

1 **PLEASE TAKE NOTICE** that, on November 17, 2021, the court held a status
2 conference (the “Status Conference”) in the above-captioned adversary proceeding (the
3 “Adversary Proceeding”). As set forth on the record at the Status Conference, the court
4 (1) continued the status conference to December 2, 2021 at 11:00 a.m. (Pacific Time)
5 and (2) ordered that the Plaintiffs and Defendants meet and confer regarding a
6 scheduling order and either (a) file a stipulated scheduling order or (b) in the event the
7 Plaintiffs and Defendants cannot agree on the terms of a consensual scheduling order,
8 file competing scheduling orders by December 1, 2021 at 12:00 p.m. (Pacific Time).

9 **PLEASE TAKE FURTHER NOTICE** that the Plaintiffs and Defendants have
10 met and conferred over electronic mail regarding a scheduling order and have been
11 unable to reach an agreement. Accordingly, the Plaintiffs’ proposed scheduling order
12 is attached hereto as Exhibit A.

13
14 Dated: December 1, 2021 BUSH KORNFELD LLP

15 */s/ Thomas A. Buford, III*
16 THOMAS A. BUFORD, III (WSBA 52969)
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22 *Attorneys for Plaintiffs*

Exhibit A

Plaintiffs' Proposed Scheduling Order

1 HONORABLE WHITMAN L. HOLT
2
3
4

5 UNITED STATES BANKRUPTCY COURT
6 EASTERN DISTRICT OF WASHINGTON

7 In re
8 EASTERDAY RANCHES, INC., *et al.*
9 Debtors.¹

10 EASTERDAY RANCHES, INC. and
11 EASTERDAY FARMS,
12 Plaintiffs,
13 v.
14 ESTATE OF GALE A. EASTERDAY
15 (DECEASED), KAREN L. EASTERDAY,
16 CODY A. EASTERDAY, AND DEBBY
17 EASTERDAY
18 Defendants.

Chapter 11
Lead Case No. 21-00141-WLH11
Jointly Administered

Adv. Pro. No. 21-80050 (WLH)

**[PROPOSED] SCHEDULING
ORDER**

16 Upon consideration of each request of the above-captioned Plaintiffs and
17 Defendants for the court to enter a scheduling order in the above-captioned adversary
18 proceeding (Adv. Proc. No. 21-80050, the “Adversary Proceeding”),

19 **IT IS HEREBY ORDERED THAT:**

20 1. The following deadlines shall apply with respect to the Adversary
21 Proceeding:

22 a. ***December 8, 2021:*** Plaintiff’s deadline to file an amended complaint (the
23 “Amended Complaint”) and/or answer to the counterclaims asserted by the
24 Defendants [Adv. Proc. Docket Nos. 14 and 15].

25
26 ¹ The Debtors along with their case numbers are as follows: Easterday Ranches, Inc. (21-00141) and
27 Easterday Farms, a Washington general partnership (21-00176).

- b. **December 22, 2021:** Defendants' deadline to answer the Amended Complaint.
- c. **January 7, 2022:** Close of written discovery. Written responses to Interrogatories, Requests for Admissions, and Requests for Production shall be due no later than 14 days from service thereof. All such documents and responses may be served by electronic mail.
- d. **February 4, 2022:** Deadline to complete document production.
- e. **February 25, 2022:** Close of fact depositions.
- f. **March 4, 2022:** Deadline to identify testifying experts.
- g. **March 18, 2022:** Reports of testifying experts must be served.
- h. **April 8, 2022:** Close of expert depositions.
- i. **7 days before Final Hearing:** Pre-trial briefing must be filed and served.
- j. **3 days before Final Hearing:** Declarations with direct testimony of fact and expert witnesses must be filed and served.
- k. **April 18, 2022 at 9:30 a.m. (Pacific Time):** In person trial begins and continues day to day until complete (the "Final Hearing").

2. The parties may modify the discovery deadlines set forth herein by the consent of the Plaintiffs and Defendants without further court approval.

3. The court shall retain exclusive jurisdiction with respect to all matters arising from or related to the implementation of this order.

/// END OF ORDER ///

SCHEDULING ORDER – Page 2

1 Presented by:

2 */s/ Draft*

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